

**CALIFORNIA EMERGENCY MANAGEMENT AGENCY****PUBLIC SAFETY AND VICTIM SERVICES DIVISION**

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April 7, 2010

Paula Johnston
Chief Operating Officer
Plumas Rural Services
586 Jackson Street
Quincy, Ca 95971

Re: DV09121657

Dear Ms. Johnston:

On April 5th and 6th, I conducted a site visit of the Domestic Violence Assistance Program operated by Plumas Rural Services. Thank you for your time and cooperation during the Site Visit. It was a pleasure meeting with you, Delicia, Stacy, Debbie, and the other staff working on the program.

During the site visit, we discussed Cal EMA's requirements for the project, the goals and objectives of the program, the project's source documentation, and the reporting requirements. As a result of the visit, I have identified areas which need corrective action. Each finding is listed below, as well as the corrective action necessary for compliance and due date by which the corrective action must be completed.

California Environmental Quality Act (CEQA)

Finding: A current CEQA was not on file.

Citation: Recipient Handbook Section 2153 requires all Cal EMA funded projects to certify compliance with CEQA. A copy of the CEQA compliance memo or other certification must be completed once during the project's grant award cycle. The original copy must be retained on file for review during site and monitoring visits by Cal EMA staff.

Corrective Action: The project must obtain a current CEQA and submit a copy to Cal EMA by **July 9, 2010**. A sample CEQA Compliance memo is located in the Recipient Handbook, Appendix U.

Comment: Contact your city or county planning department to have them prepare an environmental document stating whether the project will have a significant effect on the environment.

Fidelity Bond

Finding: The Fidelity Bond information did not have Cal EMA listed as the beneficiary; it also did not have the current grant number.

Citation: Recipient Handbook, Fidelity Bond, Section 2160, requires recipients to obtain a fidelity bond or an equivalent employee dishonesty insurance contract in an amount equal to 50 percent of the

total grant award, less matching funds. Section 2161.2 indicates the Fidelity Bond must include Form A, Employee Dishonesty, and Form B, Forgery Coverage. The Fidelity Bond must provide blanket coverage of all employees; a scheduled bond is not acceptable. Further, Section 2161.4 states the certificate holder or first loss payee must be the State of California, Emergency Management Agency. The grant numbers for each grant covered must be included.

Corrective Action: See Recipient Handbook Section 2160, Certificate of Insurance, for the components that must be included in the certificate. Documentation from an insurance carrier that verifies the grant recipient is in compliance with this requirement must be submitted to Cal EMA by **July 9, 2010**.

Organizational and Personnel Policies and Procedures

Finding #1: The project lacks written organizational policy and procedures that establish the process whereby data is collected and then reported. The project has procedures for accomplishing the recording tasks, but lacks a formalized policy for the handling of data.

Citation: Recipient Handbook Section 11400 states, “The organization must have written policies and procedures covering hiring, firing, termination, conflict of interest, benefits, salary rates, travel, etc. There should also be written procedures regarding the accounting and reporting functions, including but not limited to a) Cash receipts and revenue; b) deposits; c) cash disbursements; d) payroll; e) general ledger; and f) equipment. In addition, any other policies and procedures (e.g., purchasing contracts) that relate to operating the project must be in writing.”

Corrective Action: A comprehensive administrative policy and procedure manual should be created to formally document the methods used for the collection of data related to the project, the responsibility of personnel involved in the reporting of data, the policies for the operation of the business center on holidays and during lunch breaks, travel policy, as well as all other procedural guidelines for the functioning of the business. This process should be completed no later than **July 9, 2010**.

Finding #2: The project lacks written Personnel Policies for the accommodation of employees with disabilities.

Citation: The Recipient Handbook (Section 2151.1) discusses comprehensive state and federal civil rights regulations which include directives and prohibitions. Projects are mandated (“d”) to provide reasonable accommodation for an employee or for an applicant with a known physical or mental disability, unless the employer can demonstrate that such accommodation would impose undue hardship. Subsection “b” mandates “qualified persons with disabilities will not be excluded, denied benefits, or discriminated against, solely on the basis of the physical disability, mental disability, or mental condition, under any program or activity receiving financial assistance from Cal EMA.

Corrective Action: The project lacks written policies for addressing the needs of employees requiring reasonable accommodation. This policy should be created and included in the current Employee Handbook, and submitted to Cal EMA no later than **July 9, 2010**.

EEO Policy

Finding #1: The project lacks written policies for language assistance services that provide Limited English Proficiency (LEP) persons with meaningful access, i.e. oral interpretation services, bilingual staff, telephone interpreter lines, written language services, community volunteers, etc.

Citation: Recipient Handbook Section 2151.7 states, “Cal EMA program staff will provide an EEO Checklist to recipients prior to all site/monitoring visits. The checklist will assist Cal EMA in verifying that recipients are in compliance with state and federal civil rights requirements by noting

that various EEO documents (EEO Policy, Nondiscrimination Poster) are available at the site/monitoring.”

Corrective Action: Personnel responsible for EEO compliance should contact the Cal EMA EEO Compliance Officer at (916) 845-8454 for additional information on specific state and federal civil rights laws to ensure compliance. Additionally, the project should establish a written personnel policy and a written administrative policy for addressing the needs of those with LEP. Evidence of this new policy should be submitted to Cal EMA no later than **July 9, 2010**.

Finding #2: The project does not distribute the written EEO policy to volunteers, clients, or the general public.

Citation: See Recipient Handbook Section 2151.7.

Corrective Action: Personnel responsible for EEO compliance should contact the Cal EMA EEO Compliance Officer at (916) 845-8454 for additional information on specific state and federal civil rights laws to ensure compliance. Additionally, the project should post a copy of all EEO Policies in a public forum in addition to distributing the EEO policy to volunteers during orientation.

Functional Timesheets

Finding: The project is not currently using functional timesheets to track grant funded positions.

Citation: The Recipient Handbook (Section 11331) states “All grant-funded personnel must maintain time cards/sheets that indicate on a daily basis, the actual time worked on each Cal EMA project and account for all the time worked by the employee during the pay period... An allocation plan may be used to allocate salaries and benefits for individuals who work on more than one program or grant (see Section 2173).”

Corrective Action: Currently, the project tracks employees’ hours by grant. However, these time sheets do not provide a description of what the employee is doing during the hours billed to the grant. The current method does not indicate function; it merely indicates billing allocation. A copy of the new functional timesheet should be submitted to Cal EMA no later than **July 9, 2010**. Additionally, the Employee Handbook should be revised to provide policy as to the use of functional timesheets.

Additional Administrative Recommendations

- 1) While the current Operational Agreements are within the required guidelines, modifying the OAs with local law enforcement and the DA’s Victim Witness Program to ensure domestic violence related incidents are referred directly to the agency is advisable.
- 2) Both volunteer and staff (those responsible for direct services to clients) should have copies of the syllabus from their 40 hour training in their files. This is not mandated in the 09/10 RFA, but it is required in the 10/11 RFA.

Enclosed is a copy of the completed Site Visit Checklist form for your review. Please sign the cover page and return a copy of the page to me by **May 7, 2010** as confirmation of receipt.

Thank you again for your hospitality during the visit. If you have any questions or need assistance, please contact me at (916) 324-9104 or Jason.Stalder@calema.ca.gov.

Sincerely,

Jason Stalder
Criminal Justice Specialist
Domestic Violence Section

Enclosures